



July 25, 2006

Minerals Management Service  
381 Elden Street  
Mail Stop 4042  
Herndon VA, 20164

**RE: Comments on the notice of intent to prepare an EIS for the Cape Wind offshore wind energy project**

To Whom It May Concern:

Thank you for the opportunity to comment on the Minerals Management Service scoping process for the Cape Wind project. Cape & Islands Self-Reliance is a 501(c)(3) nonprofit environmental organization based on Cape Cod. We have followed the Cape Wind project closely since it was first proposed, and were an active participant in the MTC led stakeholder process that brought to light many facts about the project. Throughout the last four and a half years, we have been actively engaged in dialogue with individuals and organizations on all sides of the Cape Wind debate.

Self-Reliance was founded in 1980 to identify, facilitate and educate the public about sound environmental practices that help protect our ecosystem. By educating and empowering the consumer, Self-Reliance acts as a catalyst in implementing cost-saving, pollution-reducing opportunities for homeowners, businesses and municipalities. To this end we have been at the forefront of implementing renewable energy and energy efficiency solutions throughout our region for over 25 years.

The foundation that our organization is built upon is a deep concern for the environment and the economy of our region. We strive to find and implement sustainable practices that help protect our environment and improve our economy. We do not support technologies that have adverse effects on either; for instance, we have not supported the use of ethanol fuel in our region as our ongoing research has yet to conclude that this is a sustainable transportation option, however, we have strongly supported the use of biodiesel.

The staff and board members of Self-Reliance thoroughly research each technology and each project that we advocate for, and after months of investigation and debate our organization came out with conditional support for the Cape Wind project (see attached statement of support). We believe that the environmental and economic benefits of this project far outweigh any potential negative impacts and that our region would best be served by the expeditious permitting and construction of this project. **We urge you to complete your review of this project in a timely manner and to issue a permit as quickly as possible.**

The American people have been calling for significant renewable energy projects that protect our environment, improve our economy, and reduce our dependence on foreign energy sources for decades. It is understandable that when specific projects are proposed there will be people who object to them being "in my backyard." We believe that it is extremely unfortunate that the most significant renewable energy project to be

proposed in the United States for decades is in the backyard of some of the wealthiest and most politically connected people in the country, for their wealth and power have been successful in spreading an enormous amount of misinformation and fear about offshore wind energy. Attempts to block this project have come from politicians as far away as Virginia and Alaska, and many of our own politicians have been convinced to oppose this project. The hypocrisy of these efforts has been blatantly apparent.

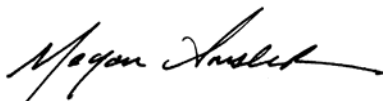
Opposition to this sort of project is to be expected, and it is perfectly reasonable for someone who owns a house overlooking the water to not want their view interrupted by towers on the horizon, or people who enjoy boating in the region to not want to share the water with a wind energy facility. Many people have a valid argument against this project in that they do not want to look at it, but knowing that this argument is not strong enough to stop the proposal, these opponents have marshaled 'experts' to find any and all additional reasons to block this project.

As we do not have any experience with offshore wind energy in the United States, and very little experience with on-shore wind in New England, there are lots of valid concerns that people in this region have about the project. Fishermen have concerns about the impact to fishing, and wildlife advocates have concerns about the impacts that this project might have to endangered and threatened species. Homeowners and realtors have concerns about the impact to property values. Airplane pilots, ship captains, and the Coast Guard have navigational concerns. Business owners have concerns about the impacts to tourism. The fossil fuel magnates who sit on the board of the Alliance to protect Nantucket Sound also have valid concerns about what Cape Wind might mean to the future of their businesses!

All of these valid concerns must be examined for Cape Wind to get a permit to site structures in the publicly owned waters of Nantucket Sound, and ultimately **you must judge if this project is in the public's best interest.** The Army Corps of Engineers, in cooperation with a multitude of other state and federal agencies, examined all of these concerns in the previous Draft EIS. The Army Corps is to be commended on the thorough review of the impacts that they conducted, and we strongly encourage the MMS to utilize all of the information that was previously reviewed. We realize that time has elapsed since this first multi-year review was conducted and that there is more data available about the benefits and impacts of offshore wind energy facilities from Europe. Through research that our staff has conducted about the impacts of offshore wind energy in Europe, including two trips to Denmark to speak to affected parties firsthand, we believe that the benefits of offshore wind have far outweighed the impacts there, and that the fears and concerns that people have about the project here will not be realized.

Thank you again for this opportunity for public comments. We look forward to reviewing your Environmental Impact Statement, and are eagerly awaiting the benefits to our environment and economy that will come about with the construction of Cape Wind.

Sincerely,



Megan Amsler  
Executive Director



Richard Lawrence  
Director of Special Projects

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**Cape and Islands Self-Reliance Board of Directors  
Position Statement in Support of Cape Wind Associates, LLC  
June 16, 2003**

The Board of Directors of Cape and Islands Self-Reliance has unanimously voted to support the offshore wind energy development project being proposed for Nantucket Sound by Cape Wind Associates, LLC, although with some conditions. We recognize that the project is consistent with the mission and goals of Self-Reliance of fostering a sustainable future for Cape Cod and the Islands through education about and promotion of sustainable technologies like renewable energy. Through our analysis of the information presented at the Massachusetts Technology Collaborative's Offshore Wind Stakeholder Meetings, (in which our staff participated as stakeholders) and a thorough review of the Cape Wind project proposal, we believe that the wind farm will provide significant local and regional benefits with minimal impacts.

Local benefits of the project include: cleaner air; improved public health; cleaner water; more reliable electricity; less reliance on foreign oil; economic development; lower and more stable wholesale electricity prices; less risk of oil spills on our beaches; improved energy security; establishment of marketable high-tech expertise; and, according to studies conducted near other utility scale wind farms, potentially more tourism, higher property values, and more fish habitat. In addition to all these direct local benefits, the project is a way for our community to start taking responsibility for our contribution to the global problem of climate change – a problem that will have significant local impacts. The Self-Reliance Board of Directors acknowledges the significant benefits that Cape Wind's project will have for our community, and believes them to be worth the tradeoffs associated with the aesthetic impact that it will have on some of our residents and visitors, and the minimal environmental impacts associated with the construction and operation of turbines in Nantucket Sound.

Self-Reliance has previously endorsed the continuation of the existing federal review and permitting process of the Cape Wind project (see CIREC Moratorium Position Statement 2/10/03). This process has provided a wealth of information and sparked valuable debate about Cape Wind's project, the issues surrounding it, and the reasons why our region would benefit from renewable energy development. We believe a direct expression of the value that this debate has had for our communities is the extent to which local towns are now seriously investigating producing a portion of their own power from wind energy. Self-Reliance encourages towns to continue to look for ways to make clean, domestic energy, and is actively supporting these efforts.

The Self-Reliance Board of Directors' support for the Nantucket Sound wind farm project is contingent on the following criteria, which we are confident will be fully complied with.

**1) The Cape Wind project must meet or exceed all requirements of the various review processes to which it is subject by law.**

The federal review of the Cape Wind project is being coordinated by the Army Corps of Engineers. Decisions and recommendations made by the Army Corps are fundamentally guided by the National Environmental Policy Act, as well as the Corps' own comprehensive public interest review. Several other regulatory agencies have input into the approval and permitting of the project, such as the U.S. Environmental Protection Agency, Federal Aviation Administration, U.S. Fish and Wildlife Service, National Marine Fisheries Service, Massachusetts Environmental Policy Act Office, Massachusetts Coastal Zone Management Office, and the Cape Cod Commission. The Self-Reliance Board of Directors agrees that experts from a broad spectrum of disciplines are comprehensively reviewing the Cape Wind proposal for its potential impacts on a diverse set of public concerns. Based on our knowledge, we fully expect the project to meet all requirements of these and any other agencies responsible for the project's approval, and our support is contingent on that occurring.

**2) Before construction begins, Cape Wind will implement a decommissioning plan to remove the wind farm in the event of bankruptcy, abandonment, etc.**

The Self-Reliance Board of Directors recognizes that a description of a plan for decommissioning was required and submitted for review in Cape Wind's application for an Environmental Impact Review of their project. We furthermore recognize that Cape Wind is not required under any law to enact such a plan; however, we expect that the decommissioning plan will become a requirement of permitting by the Army Corps. The plan they have proposed will incorporate, into the initial capital costs of the project, the funds needed to remove the turbines in an environmentally sensitive way. These funds will be administered by a separate agency so that they are available in the event of bankruptcy. We believe that this is the first time that a private energy company has volunteered to pay for decommissioning as a part of the project cost (nuclear power facilities were required to have decommissioning built in, but this was subsidized by taxpayers money). We fully expect Cape Wind to follow through on their plan for decommissioning, whether they are required to or not, and our support is contingent on that occurring.

**3) The Cape Wind project will be bound by any future regulatory requirements developed by Congress that apply to wind energy facilities sited in federal waters.**

While we believe that the existing system of review and permitting is sufficient to protect a diverse set of public interests, the Self-Reliance Board of Directors recognizes the need for Congress to create a comprehensive regulatory policy to oversee the siting, permitting, and management of renewable energy development in federal waters (see CIREC Moratorium Position Statement 2/10/03). This may include provisions for leasing, royalties, or other forms of payment to be made to the government, such as those imposed on the offshore oil and gas industry; or may not, such as applies to the fishing industry. Because of the legal structure surrounding the permit that Cape Wind is seeking, we understand that future policies, when they are enacted, would apply to the Cape Wind project, and our support for the project is contingent on this remaining to be true throughout the project's lifetime.

While the Cape Wind project, as it has been proposed, promises to bring many local and regional environmental and economic benefits, the Board of Self-Reliance is in agreement that Cape Wind Associates could do more to guarantee additional direct benefits to residents of the Cape and Islands if their project is permitted. In an effort to

ensure that the Cape Wind proposal benefits local citizens as much as possible we extend our conditions of support to include the following “Terms of Endorsement.”

**1) Cape Wind should actively seek long-term power supply contracts with local suppliers of electricity.**

Local residents have rightly expressed a great deal of concern that the reduced wholesale price of electricity produced by the Cape Wind project will be spread over the entire New England Power Grid, rather than directly reducing local rates; and that the electricity, while physically consumed on Cape, could be sold to suppliers all over the Northeast. It is possible for local entities, such as the Cape Light Compact and NSTAR, to negotiate long-term power contracts to ensure that electricity savings are passed directly onto local ratepayers, and that local businesses and residences have the choice of purchasing green power from the wind farm. The Self-Reliance Board of Directors believes that Cape Wind should solicit bids from local electricity distributors so that the region in which their power is produced will benefit most from its sale.

**2) Cape Wind should commit to a program of local employee recruitment and training with respect to the construction and operations of the wind farm.**

The Self-Reliance Board of Directors acknowledges Jim Gordon’s desire to have skilled workers trained locally through such institutions as the Cape Cod Community College, and we encourage Cape Wind to continue to support the development of educational programs in this region. Furthermore, when the Nantucket Sound wind farm is permitted, we implore Cape Wind to focus their recruitment efforts to skilled workers from this region that can be trained in the particular demands of construction, operations, and maintenance of the project, so that our region’s economy can capitalize on this project to the greatest possible extent.

**3) Cape Wind should use a portion of their profits from the sale of electricity to establish a fund that will support local community organizations and public endeavors that improve the sustainability of the Cape and Islands.**

Cape Wind mentions on their website that their management has a history of being good community neighbors and acting as responsible corporate citizens. The Board of Directors of Self-Reliance recognizes the good track record that Cape Wind’s management has with previous projects and with their own personal philanthropy. We ask Cape Wind to give Cape residents measurable justification of their statement that they “share our neighbors’ concerns for the environment - and act accordingly,” by formally committing to having a portion of the profits from the wind farm to be donated to a fund which will support local efforts to safeguard the environment, protect our shared resources, and support our communities.

**Self-Reliance Board of Directors**

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